

**Environmental Assessment
Public Comment Matrix**

April 2009

#	Commenter	Comment	Response	Section of EA Revised
Southern Utah Wilderness Alliance (SUWA) April 12, 2009 Comment Letter				
1.	SUWA	BLM must conduct an Environmental Impact Analysis or deny this proposal. If BLM does not deny the proposal then the agency must issue a Supplemental EA or EIS.	<i>BLM has determined that significant impacts would not result from implementation of UEC's Plan of Operations. BLM has prepared a FONSI. There is no requirement to prepare a Supplemental EA. The EA is not final until the DR/FONSI is signed by the BLM authorized officer. The DR will not be signed until after public comments are considered and any changes, as a result of public comment, are made to the document.</i>	<i>No change required</i>
2.	SUWA	"the EA fails to confirm that the proposed access routes (B258, D0029, D5319) and the proposed "re-route" of "a 0.75 mile segment of Country Road D5319 are all designated routes in the newly issued Monticello RMP/Travel Plan."	<i>Routes D0029 and B258 would provide the only access to the Daneros Mine. These routes are designated in the Monticello Field Office Travel Plan. UEC would not be authorized to use any other route. For public safety purposes, access on route D0029 would be limited to authorized personnel during the 7-year operation. Public access would be restored after mine operations are complete. This was clarified in the Proposed Action. A discussion of impacts resulting from restricting public access on route D0029 was added to Appendix A.</i>	<i>Proposed Action and Appendix A</i>
3.	SUWA	"There are unknown impacts to air quality from the mining operation itself, and from the dust generated by haul trucks. The EA fails to include projected quantitative amounts for PM2.5 (EA at 20-21).	<i>Calculations of criteria pollutants were added as Appendix L in the EA and, table 8 was also updated to reflect new calculations. A more detailed discussion of criteria pollutant emissions from the project, including PM2.5, was added to Chapter 4.</i>	<i>App. L, Table 8 and, Ch. 4 –air quality</i>
4.	SUWA	"There is uncertainty to public health and safety from radioactive dust on waste to be disposed of at local landfills (the EA fails to assess what is meant by "negligible" amounts, as noted in the BLM's Conversation Confirmation Report with Utah DEQ, Div. of Solid and Hazardous Wastes (attached), and from the dust generated by haul trucks on roads sprayed with radioactive water (EA at 32)."	<i>The EA states that all scrap metal and other recyclables that are not above ambient levels of radiation would be handled as regular construction waste. Any solid wastes that qualify as low-level wastes for radiation contamination, per NRC guidelines (i.e., not a product or a by-product of ore extraction or production), would be handled in accordance with the Low-Level Radioactive Waste Policy Amendments Act of 1985 at an NRC-approved facility or Utah Division of Radiation Control-approved facility.</i> <i>The determination that the non-NRC regulated solid waste would have "negligible" amounts of radioactive dust was made by the Utah Department of Environmental Quality (DEQ), Division of Solid and Hazardous Wastes, not by the BLM. The BLM will defer to the agency with jurisdictional expertise which was the purpose for the BLMs consultation with DEQ.</i> <i>A discussion of impacts associated with the proposed use of water from Fry Spring for dust suppression was added to Chapter 4 under water quality. Calculations show that there would be an undetectable increase in the amount of uranium in the soils as a result of applying water from the Fry Spring for dust control.</i>	<i>Ch. 4- water quality</i>
5.	SUWA	"Although EA states there will be no impact to surface water as there are no permanent or intermittent bodies of water within the PPA (EA at 24), and EA's wildlife section contradicts this statement, by noting that there are springs in the	<i>The small seep used by bighorn sheep is located at the head of Bullseye Canyon approximately 1.5 miles northeast of the proposed mine site at an elevation about 600 feet above the portal. This was clarified in chapter 3 under the bighorn</i>	<i>Ch. 3- bighorn sheep</i>

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		area, including a “seep at the head of Bullseye Canyon.” EA at 26. In addition, the Utah Division of Water Rights letter states that there are several springs in the area (attached).”	<i>sheep section. With exception of desert bighorn sheep, the seep is not part of the affected environment because it is well outside of the influence of the mine disturbance (based on distance and elevation). The three water sources (Fry Spring, Bullseye Spring and Bullseye Well) identified by the Division of Water Rights are clearly defined in the EA.</i>	
6.	SUWA	The BLM is required to consider the unique characteristics of the geographic area in which the project is located, such as proximity to historic or cultural resources, wild and scenic rivers, and ecologically critical areas. BLMs failure do this is evidenced by comments it received from the Navajo and Hopi tribes. In particular, 1) the Navajo Nation stated that based on its HPD-TCP Sacred Sites Database, there are many cultural areas and sites within the proposed area of the project and that further extraction of uranium ore would damage the cultural entities involved and the project is not in the best interest of the Navajo Nation and 2) the Hopi Tribe considers archaeological sites of their ancestors to be Traditional Cultural Properties and, they oppose uranium mining pursuant to the doctrine of discovery and 1872 mining law.	<p><i>As listed in Appendix A of the EA, the following Critical Elements of the Human Environment will not be affected because they are not present in the project area: Areas of Critical Environmental Concern (ACEC), Prime or Unique Farmlands, Wetlands or Riparian Zones, Wild or Scenic Rivers and Designated Wilderness or Wilderness Study Areas (WSA). Cultural resource inventories were conducted for the Area of Potential Effect (APE). No National Register of Historic Places (NRHP)-eligible or otherwise significant cultural resources were found in the APE. No historic properties would be affected by the proposed project.</i></p> <p><i>The BLM consulted with 15 tribal entities in order to identify traditional cultural properties, sacred sites, or cultural areas that may be located within the project area. The BLM received responses from two tribes, the Hopi and Navajo. The BLM conducted additional consultations with the Navajo and Hopi based on the comments provided by them. A discussion of these consultations was added to Chapter 5 under Consultation.</i></p> <p><i>The BLM believes that it has made a good faith effort to consult further with the Hopi Cultural Preservation Office and the Navajo Historic Preservation Department (HPD) on their concerns related to the proposed project. Concerns expressed by the Hopi did not relate to specific sites, TCP's, or sacred areas. While the BLM acknowledges the Hopi Tribes opposition to uranium mining, it still must consider and analyze the proposed project, and to date has not been provided with any further comments or concerns that could be considered or addressed as part of the EA. The Navajo HPD concluded, by letter dated May 8, 2009, that the proposed undertaking will not impact any Navajo traditional cultural properties.</i></p>	Ch. 5 -Consultation
7.	SUWA	“BLM must discuss the mitigation measures in sufficient detail to ensure that environmental consequences have been fairly evaluated.”	<i>Many Mitigation or design measures are included in the Plan of Operations to reduce impacts. These built-in mitigation measures include public and worker protection from radiation exposure, a stormwater pollution prevention plan, fugitive dust control plan, weed control plan, proper waste disposal measures, wildlife timing limitations, BMPs for VRM, and approved revegetation and reclamation methods. The Proposed Action also incorporates the requirements of applicable federal, state and local laws, regulations, and permits and, all applicable management actions prescribed in the BLM Land Use Plan, including Best Management Practices (BMPs), Standard Operating Procedures (SOPs) and stipulations. These built-in protective measures are discussed appropriately in</i>	Section 4.2.4

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			<p>Chapter 4 of the EA to show their effectiveness at eliminating or reducing impacts.</p> <p>Based on analysis of environmental impacts documented in the EA, the mitigation measures incorporated into the Proposed Action would effectively prevent or minimize impacts. No impacts have been identified that exceed statutory limits for water quality, air quality or radiation exposure. The measures in the Proposed Action would protect the long term health of the desert bighorn sheep population and prevent impairment of existing water rights.</p> <p>Section 4.2.4 identifies one additional measure that BLM could consider to further reduce the minor impacts associated with the Proposed Action. A discussion of the impacts of implementing this additional mitigation measure (stockpiling of inert waste rock material for added cover over the mineralized waste rock to reduce risk of radiation exposure and ARD) was added to section 4.2.4 of the EA.</p>	
8.	SUWA	SUWA proposes that a reasonable alternative would be to have the proponent clean up the site of all previous mining operations before new operations would be allowed.	<p>The BLM added Section 2.4 to consider this alternative based on public comments. Under this alternative, UEC would be required to clean up the old waste rock dump at the McCarty-Coleman Decline before commencing new mining activities. As stated in section 2.4 of the EA, this alternative was eliminated from further analysis because it is not needed to resolve conflicts or mitigate impacts of the Proposed Action and because it does not meet the underlying need for the proposal.</p> <p>Based on environmental analysis documented in Chapter 4, no impacts were identified that would require additional mitigation through the implementation of a separate action alternative. Environmental impacts associated with UEC's proposed use of a part of the historic waste rock dump for ore storage and waste rock disposal would be minor. Protective measures incorporated into the Plan of Operations would contain surface run-off and dust on site during operations and the proposed reclamation would stabilize the site after operations are complete. Under the Proposed Action, much of the historic waste rock dump would be reclaimed. This would result in beneficial impacts to air quality, water quality and human and health and safety. Thus, clean up of the historic waste rock dump is not an alternative designed for the purpose of avoiding or mitigating impacts of the Proposed Action but rather, a separate action designed for the purpose of improving the existing environment. Such action does not meet the underlying need to mine a valuable uranium deposit.</p> <p>UEC has no legal obligation to reclaim historic mine disturbances as a precondition to mining. Operations authorized by the mining laws must be</p>	Section 2.4 added

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			<p>conducted in a manner that prevents unnecessary or undue degradation of public lands. This standard requires that a mine operator reclaim areas disturbed by its operation. Under the Proposed Action, UEC would reclaim all areas disturbed by its operations, including part of the old McCarty-Coleman waste rock dump.</p> <p>Removal and relocation of the historic heap would require a suitable repository location and an additional source of material to cover the waste rock material. This would cause greater surface disturbance than the Proposed Action. The historic waste rock dump material would have to be moved a minimum of ½ mile to a suitable location away from the ephemeral drainage of Bullseye Canyon. This would add substantial costs to the small mine operation.</p>	
9.	SUWA	“The no action alternative is a reasonable alternative that deserves proper analysis.” “The inappropriate bias in the EA in favor of the proposed action is a violation of NEPA’s requirement to present objective and scientific data and analysis for the decision –maker and interested public.”	The BLM would not approve UEC’s MPO only if the operations, as proposed, were determined by BLM to cause unnecessary or undue degradation of public lands. The no action alternative provides a baseline for analyzing impacts. Impacts of the no action alternative are discussed in Chapter 4 of the EA and summarized in table 1. The BLM feels that the discussion of environmental impacts under the no action alternative is adequate. The commenter provides no specific reasons why the analysis is inadequate.	No change required
10.	SUWA	“The EA fails to adequately assess cumulative impacts.” BLM must catalogue past, present, and reasonably foreseeable projects in the area. SUWA suggests these include: old uranium mines in southeastern Utah, other UEC current projects including Geitus, Blue Jay, Marcy-Look, and Thompson, other mining operations currently being permitted, and a new uranium mill, the proposed nuclear plant near Green River Utah, and transporting “ore to other mills”	A discussion of other small uranium mines in the vicinity of the proposed Daneros mine is included as a part of the cumulative impacts section. However, other UEC properties in Utah are not relevant to the analysis. As stated in the EA, there are no other mining operations proposed at this time. Many companies, including UEC, have other properties (mining claims) in San Juan County or elsewhere in Utah that may or may not be developed. Cumulative impacts are based on reasonably foreseeable action scenarios, not speculation. The BLM has not identified any uranium mining, milling, or nuclear power plants that are connected actions in terms of contributing to cumulative impacts. The cumulative impacts associated with transportation of ore to the White Mesa Mill are analyzed in the EA. Refer to comment responses 28 and 65.	No change required
11.	SUWA	The “EA fails to take a hard look at impact to water resources including surface water quality and quantity of groundwater, seeps and springs.” SUWA expresses concerns over the dust control program and spraying “water with elevated uranium levels on road and construction surfaces.”	<p>A thorough analysis of impacts to water quality and quantity (both surface water and groundwater) is presented in the EA.</p> <p>A Discussion of impacts associated with 1) the temporary use of water from Fry Spring for dust suppression and 2) impacts of mining disturbance on the Bullseye Spring and Well was added to Chapter 4 under water quality and quantity, respectively. Calculations show that there would be an undetectable increase in the amount of uranium in the soils as a result of temporarily applying water from the Fry Spring for dust control. Based on impacts discussed in the EA, mining disturbance would not impair water rights.</p>	Ch. 4 - water quality & quantity
12.	SUWA	SUWA alleges that BLM failed to “assess the impacts to a legislatively proposed wilderness area adjacent the proposed mine site.”	The BLM inventoried and evaluated lands for wilderness characteristics as part of the RMP process. That evaluation process is documented in Appendix O of the	No change required

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			Proposed RMP/FEIS, dated August 2008. The PPA is not within any of the lands found by BLM to have wilderness characteristics. The proposed project is within the part of the Red Rock Plateau inventory area which was found to lack wilderness characteristics (BLM 2008a: table 3.19 and map 33). This information is presented in Appendix A of the EA. The BLM decided not to manage for wilderness characteristics in adjacent lands. Within the range of alternatives for the planning effort, these adjacent lands were considered and thoroughly analyzed for the protection, preservation, and maintenance of those wilderness characteristics as well as for the impacts that could occur if other important resources and uses were allowed. The Approved RMP did not carry forward for the protection of wilderness characteristics in adjacent lands but chose to provide opportunities for other resource development and uses. For this reason, continuing to provide protection or analyze the impacts of the proposed action on adjacent lands with wilderness characteristics is not an issue for analysis in this EA which is an implementation-level activity associated with the 2008 Monticello FO ROD/Approved RMP.	
13.	SUWA	"The EA fails to include adequate baseline information for various resources and environmental conditions, including the soil contamination along the haul routes and the mine site, air quality, ground water quality and quantity, and surface water quality and quantity."	Baseline samples or studies include, cultural surveys; biological surveys; hydrology report, weed survey; surface water samples at Fry and Bullseye Springs; soil baseline samples of waste rock dump, ephemeral drainage and mine haul road and adjacent undisturbed areas; ambient air data from nearest monitoring stations in southeast Utah and gamma background survey of the mine site. This data is presented in appropriate sections of the EA. The commenter does not provide specific examples of why this data is inadequate.	No change required
14.	SUWA	NEPA requires BLM to use accurate scientific information of high quality and they should use best available science. "Both data and analyses must be disclosed to the public." BLM must disclose uncertainty of impacts.	The BLM relied on the best scientific information available to analyze environmental impacts. That information is fully disclosed in the EA. There are no predicted effects on the human environment that are considered to be highly uncertain or involve unique or unknown risks. The commenter provides no evidence that the scientific information relied upon is inadequate.	No change required
15.	SUWA	The BLM must respond to substantive comments made during the public comment period and that agency respond in a meaningful way. "BLM must complete a conforming NEPA analysis that fully considers and responds to public comments, including opposing scientific opinion, and justifies any contradicting conclusions."	The BLM accepted and carefully reviewed all comments on the EA that were received during the public comment period. The BLM response to each substantive comment is documented in Appendix M of the EA. Appropriate changes were made to the document as a result of public comments.	Appendix M added
16.	SUWA	The EA has flaws in regards to the air quality analysis. "The EA fails to include background concentrations of national ambient air quality standards (NAAQS) criteria pollutants other than ozone and particulate matter." SUWA states that BLM should conduct dispersion modeling, that the EA should consider impacts of dust on mountain snow pack, and that the EA fails to consider the cumulative impacts to air quality from vehicles traveling on routes designated in the Monticello RMP travel plan.	The EA provides the only background information on criteria pollutant ambient concentration data that is publicly available from the state and US EPA. Information on the amount of criteria pollutants generated from the project was added to the EA. Based on Utah Division of Air Quality Modeling Guidelines (December 2008), the amount of criteria pollutant emissions from the proposed generator would not require dispersion modeling. In addition, based on screening criteria (total quantities of criteria pollutants generated and distance from Class I areas) of the Federal Land Managers Air Quality Working Group (FLAG), no	Appendix L, Table 8 and, Ch. 4 – air quality

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			<i>modeling is indicated. The project will contribute 16 additional daily round trips on route B258. The air quality impacts from these additional vehicle trips are disclosed in the EA. Also, refer to comment responses 3 and 19.</i>	
17.	SUWA	"The BLM must list background concentrations for all NAAQS Criteria Pollutants." SUWA suggests that all NAAQS criteria pollutants be listed and discussed in detail.	<i>Refer to comment responses 3 and 16.</i>	<i>Appendix L, Table 8 and, Ch. 4 – air quality</i>
18.	SUWA	The BLM must conduct dispersion modeling and reference a letter from EPA submitted to BLM during the RMP process in 2008. SUWA contends that BLM must predict levels of NO ₂ , PM ₁₀ , and SO ₂ related to PSD increment so for the area.	<i>Refer to comment responses 3 and 16.</i>	<i>Appendix L, Table 8 and, Ch. 4 – air quality</i>
19.	SUWA	The BLM should consider impacts of dust on mountain snow pack.	<i>This was not identified as an issue during scoping. The proposed project is a small site-specific action with dust control measures designed for 80 percent control. The project would emit a relatively small amount of dust (33 tons per year). The Federal Land Managers Air Quality Working Group (FLAG) recognizes in their accepted air modeling protocols that almost all PM₁₀ drops out within 36 km of the source. The nearest mountain snow pack (Abajo Mountains and Henry Mountains) is nearly twice that distance from the project.</i>	<i>No change required</i>
20.	SUWA	"The BLM must perform dispersion modeling for all NAAQS criteria pollutants in order to understand the impacts of this project on air quality." SUWA contends that BLM failed to consider the cumulative impacts of other resource decisions that it has made in the Monticello RMP. "SUWA instructed the BLM that it was required to analyze the contribution of all-road vehicle travel on designated routes in the RMP's travel plan." "SUWA's critiques on the Monticello RMP apply to the cumulative impacts analysis prepared by BLM for the Daneros Mine EA." SUWA resubmits (19-28) the critiques of the Monticello RMP.	<i>Refer to comment responses 3 and 16.</i>	<i>Appendix L, Table 8 and, Ch. 4 – air quality</i>
21.	SUWA	"BLM must comply with its Section 106 obligations before issuing a decision."	<i>The BLM has completed consultations under Section 106 of the National Historic Preservation Act. Cultural resource inventories were conducted within the area of potential effect. Consultation with the Utah State Historic Preservation Officer was conducted under the Utah Protocol of the BLM's nationwide programmatic agreement. On March 31, 2009 the SHPO concurred with BLM's determination of No Historic Properties Effected for the project. Fifteen tribal entities were consulted on the project. Comments were received from the Hopi and Navajo Tribes. Additional consultations were undertaken with the Hopi and Navajo. The results of these consultations are added as a detailed discussion in Chapter 5 of the EA.</i>	<i>Ch. 5 - Consultation</i>
<p align="center">Uranium Watch April 13, 2009 Comment Letter</p>				
22.	Uranium Watch	"The FEIS... in no manner contains an analysis of the cumulative impacts of uranium mining in the Red Canyon and White Canyon Mining District, the	<i>The RMP/FEIS is not intended to be a site specific document. The FEIS analyzes cumulative impacts on a planning-level basis and provides a framework for which</i>	<i>Ch. 4 -cumulative impacts</i>

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		Colorado Plateau, Utah, or the Four Corners area.... The impacts of uranium mining area unique and should be assessed separately from the broader impacts of mineral development in San Juan County and the Four Corners area. This failure to asses the cumulative impacts of uranium mining in San Juan County and the region is a grave flaw in the EA."	<i>to tier implementation-level actions. Some discussion was added to the EA to clarify the relevant cumulative impacts resulting from the Proposed Action.</i>	
23.	Uranium Watch	"The past, current and future impacts of all of these mining operations on public lands have never been assessed...." UEC has "three additional proposed uranium projects in the vicinity of the Daneros Project.... the historic, current and proposed uranium mining activities on public land in the Monticello District and the region should be addressed."	<i>As stated in the EA, there are no other mining operations proposed at this time that would contribute to cumulative impacts. Many companies, including UEC, have other properties in San Juan County or elsewhere in Utah that may or may not be developed. Cumulative impacts are based on reasonably foreseeable action scenarios, not speculation. Also, refer to comment response 10.</i>	<i>No change required</i>
24.	Uranium Watch	Ore mined at Daneros may not be entirely "sold and used for fuel in domestic nuclear power plants and not for foreign nuclear power plants."	<i>There is no requirement that uranium ore produced in the U.S. must be used to fuel domestic nuclear power plants. However, uranium ore produced at the Daneros Mine may be used for such purpose.</i>	<i>No change required</i>
25.	Uranium Watch	"In discussing the benefits to the U.S. nuclear industry of the proposed mine operation, mention should be made of that fact that the applicant, Utah Energy Corporation, is a wholly owned subsidiary of White Canyon Uranium Limited, an Australian company."	<i>UEC qualifies to own mining claims located under the mining laws of the United States. The fact that UEC is a subsidiary of White Canyon Uranium Limited is not pertinent to the analysis of environmental impacts.</i>	<i>No change required</i>
26.	Uranium Watch	"The BLM should explain what 'consistent' means and specify exactly what sections of these extensive laws and regulations the Proposed Action is 'consistent with.'"	<i>UEC must comply with the provisions of all pertinent Federal, state and local laws. Section 1.6 is not intended to be a comprehensive list. It identifies the major laws and regulations and their applicability to the Proposed Action.</i>	<i>No change required</i>
27.	Uranium Watch	"The EA should state that any low-level radioactive material would be disposed of at an NRC- or Utah Division of Radiation Control-approved facility."	<i>This was clarified in Chapter 2 of the EA.</i>	<i>Ch. 2 –Proposed Action</i>
28.	Uranium Watch	The BLM should provide data for and analyze all current and predicted uranium-related traffic on Hwys 95 and 191 to and from the White Mesa Mill, as well as all other uranium transportation activity, current and predicted, in the region. "The BLM must also analyze the impacts associated with the transportation to and development of and transportation to other uranium mills that are being or might be developed in the Four Corners area."	<i>As stated in the EA, the Daneros Mine would increase current traffic levels (all traffic, not just uranium industry) by 16 round trips per day. The additional Daneros traffic would not degrade the existing LOS A for State Highway 95 or the existing LOS B on State Highway 191. Anticipating transportation to other uranium mills that may be developed in the region is outside the scope of this analysis.</i>	<i>No change required</i>
29.	Uranium Watch	The project requires an EIS to comprehensively address all impacts of all uranium activity in the region. "Only a full EIS would be able to address all the impacts of uranium mining in the region in a comprehensive manner-and in compliance with the NEPA."	<i>BLM has determined that significant impacts would not result from implementation of UEC's Plan of Operations. BLM has prepared a FONSI.</i>	<i>No change required</i>
30.	Uranium Watch	The BLM should clarify between the exhaustive capacity of the Daneros mine (4,000 tons/month) and the predicted total output for the life of the mine (100,000 tons). The proponent has claimed the 100,000 limit in order to avoid regulatory radon monitoring. " So, it appears from this information that the Utah Energy intends to mine well over 100,000 tons of ore over the lifetime of the mine; or, the information provided in the EA inaccurate and misleading.... The BLM should require that the Daneros Mine comply with the standards and requirements of 40 C.F.R. Part 61, Subparts A and B, and not try to evade these	<i>UEC proposes to mine a maximum of 100,000 tons of ore over the 7-year operation. The operation would not produce ore at a rate of 4,000 tons/month throughout the 7-year mine operation. Ore production would average less than 1,200 tons per month over the life of the operation. The average monthly production takes into account the development and reclamation phases of the operation during which no ore would be produced. Therefore, a radon monitoring program pursuant to 40 CFR Part 61 is not required. Although not required based on total ore production over the life of the mine, UEC proposes to</i>	<i>Ch. 3 - air quality</i>

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		requirements with unreasonable claims that they will only mine 100,000 tons of ore during the life of the mine.”	implement radon monitoring and reporting procedures consistent with the NESHAP Subpart B standards as outlined at 40 CFR Part 61. This was clarified in Chapter 3 of the EA under air quality.	
31.	Uranium Watch	“The BLM must require a radon monitoring program at the Daneros Mine, in accordance with 40 C.F.R. Part 61, Subpart A and Appendix B, Method 115.” This demand is repeated regarding the impacts assessment, EA Section 4.2.1, as well.	Refer to comment response 30.	Ch. 3 - air quality
32.	Uranium Watch	“The Utah Division of Air Quality, the Environmental Protection Agency (EPA), the BLM, the nearby residents at Fry Canyon and Natural Bridges National Park should know exactly what the Daneros Mine radon emission rates are in a timely manner.”	Refer to comment response 30.	Ch. 3 - air quality
33.	Uranium Watch	“The BLM must require a radon-monitoring program for the Daneros Mine (in accordance with 40 C.F.R. Part 61), reviewed by the appropriate state agency, and a commitment by Utah Energy to submit annual radon emission compliance reports, on because the Daneros Mine is likely to exceed the threshold ore tonnage and is near residences at Fry Canyon and Natural Bridges National Monument.”	Refer to comment response 30.	Ch. 3 - air quality
34.	Uranium Watch	“The BLM should describe of how Utah Energy will monitor these radon sources for compliance with 40 C.F.R. Part 61, Subparts A and B.”	Refer to comment response 30.	Ch. 3 - air quality
35.	Uranium Watch	“The EA fails to acknowledge the hazards associated with radioactive particulates that adhere to dust particles...The BLM should discuss the hazards associated with these radioactive aerosols and dust particles and how they will be monitored on and off the site.”	The EA acknowledges the potential impacts of radioactive dust as well as measures to mitigate those impacts.	No change required
36.	Uranium Watch	“The BLM should assess the impacts of radon dispersion in the vicinity of the Daneros Mine due to local air drainage and atmospheric conditions.”	As stated in the EA, in the open air, the amount of radon gas is very small and does not pose a health risk (Health Canada 2007). Radon is primarily a health concern only in confined spaces due to its concentration and accumulation, Although radon emissions from the Daneros Mine operation are not anticipated to be a health risk, UEC proposes to implement radon monitoring and reporting procedures consistent with the NESHAP Subpart B standards as outlined at 40 CFR Part 61. This was clarified in Chapter 3 of the EA (see comment response 30).	Ch. 3 - air quality
37.	Uranium Watch	“There is no discussion of any clean up standards for soil and groundwater that were used by state and federal agencies in the past and would be used in the future as a basis for site reclamation and as a basis for the protection of groundwater resources in the future. Without such standards, the operation of the Daneros Mine will only add to environmental impacts.”	No Federal or state agency identified reclamation standards for the Proposed Action. Federal and state standards for licensed uranium mills do not apply to underground uranium mines. Reclamation standards for mines, including monitoring requirements, are based on site-specific impacts analyzed in the EA and mitigation proposed as a result. Specific reclamation and monitoring standards would be attached as conditions of approval to any BLM decision authorizing the action.	No change required
38.	Uranium Watch	“The BLM needs to explore other scenarios for the cleanup of the old mine dump, old ore pad, and new mine waste.”	Refer to comment response 8.	Section 2.4 added

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39.	Uranium Watch	A previous mining operation at the Daneros Mine site “has been measured for radiation at 3800 mRem/yr...It is clear that contamination from past mining activities, which has not been adequately analyzed, should be cleaned up prior to commencement of operations.”	<i>Refer to comment response 8.</i>	<i>Section 2.4 added</i>
40.	Uranium Watch	In regard to the location of the existing waste dump and possible impact to workers, Uranium Watch requests that it “should be moved to an area where it is not adjacent to an ephemeral stream. Contaminated soils from the ore pad and elsewhere should be removed. The removal of the historic waste dump and clean up of the rest of the site should be carried out before any new mining begins. These mitigation and remedial actions should take place before any new mining operations in order to prevent possible impacts to workers on site from exposure to the ore pad and waste rock pile and to prevent leaching into the ephemeral stream from the waste dump, ore pad, and other sources.”	<i>Refer to comment response 8.</i>	<i>Section 2.4 added</i>
41.	Uranium Watch	“the removal of the waste dump, contaminated ore pad soil and rock and other contaminated material and placement in an area that is protected from runoff and covered with clean soil and rock-prior to commencement of new mining operations-should have been considered as one of the alternative in the EA.”	<i>Refer to comment response 8.</i>	<i>Section 2.4 added</i>
42.	Uranium Watch	“the BLM should have a copy of the Storm water Pollution Prevention Plan that has been developed by Utah Energy for the Utah Pollutant Discharge Elimination System (UPDES) permit. That plan should be part of the application and available to the public to review.”	<i>The SWPPP is part of the Plan of Operations which was made available for public review on the Monticello Field Office website. The SWPPP is shown in Appendix E of the EA and is also available for review at the Monticello Field Office.</i>	<i>No change required</i>
43.	Uranium Watch	“The discussions about radiation studies are brief and there is no attempt to connect the results of these studies to the actual operation of the Daneros Mine or the cumulative health impacts from the beginning of the uranium industry in Utah and the Four Corners area. All studies and data regarding the health impacts of uranium mining and milling are not included. ” Uranium Watch suggests, “This section should be expanded to a full and unbiased discussion of the reality of the health impacts from uranium mining, hauling, and milling; or, it should be deleted entirely.”	<i>A comprehensive study of health effects of uranium mining and the history of the uranium industry in Utah is beyond the scope of this document. Also refer to comment response 46.</i>	<i>No change required</i>
44.	Uranium Watch	In regard to past worker exposure and safety, the commenter states, “This section should have included data on the number of uranium mine, ore hauling, and milling workers (or their surviving families) in Utah and the Four Corners area who have received compensation and who have applies for compensation under RECA. Data on the number of deaths, number of workers eligible for compensation, number of workers compensated, analysis of the health impacts found among the workers, and other information relevant to a full analysis of the health impacts of uranium mining and milling in Utah and the Four Corners area should be included in any discussion of radiation.”	<i>Representation of this information is outside the scope of this analysis. Also, refer to comment response 43.</i>	<i>No change required</i>
45.	Uranium Watch	“The information in this section uses terms, numbers, and calculations that are not readily understandable to a member of the public. The information relied	<i>Scientific notation is the generally accepted standard of expressing very small numbers. Expressing numbers to their full decimal place can be cumbersome and</i>	<i>No change required</i>

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		upon is not available in the EA.” Further, it is suggested that “This section should be revised to include definition of terms, leave out numbers such as "5.5 x 10-8" (which most people do not understand), and include the bases for all this data in an appendix.	<i>introduce a greater chance of human error.</i>	
46.	Uranium Watch	“This section references the occupational radiation dose for uranium miners from 1985 to 1989. That is a very limited set of data, since most uranium mines and uranium mills in the U.S. had closed by that time. To be more relevant, that data would have to include data on occupational radiation exposure associated with uranium mining from all years that uranium mining took place. Also, the accuracy of any data regarding uranium mine occupational exposure to radiation is questionable, due to failure to properly measure, document, and account for all occupational exposure.	<i>The research cited is appropriate. Studies of worker exposure decades ago before governing regulatory authorities were in place would not be representative of the health risks posed to today’s miners. The much more stringent health and safety requirements in place during the period of most recent uranium mining better represents the conditions that can be expected at the Daneros Mine.</i>	<i>No change required</i>
47.	Uranium Watch	“The analysis in the EA of the impact of low-level radiation to uranium miners lacks a full, unbiased discussion of the impacts to uranium miners. There are many studies related to exposure to low-level radiation that have not been discussed or referenced. This section should be expanded in the context of an EIS or eliminated.”	<i>Impacts to worker health and safety were analyzed based on the assumption that stringent standards and regulations administered by MSHA would be adhered to and, that these standards are sufficient to protect worker health.</i>	<i>No change required</i>
48.	Uranium Watch	“This section should include an analysis of recent Mine Safety and Health Administration inspections of uranium mines that have contributed to uranium ore to the White Mesa Mill, and the MSHA and Division of Radiation Control inspections of the White Mesa Mill itself, in order to provide a more realistic picture of the working environment for uranium mine and mill workers in the area. Inspection, violation, and accident information for all operating uranium mines in the U.S. are available on the MSHA website (http://www.msha.gov). Recent White Mesa Mill inspections are available at the Uranium Watch website: (http://www.uraniumwatch.org/denisonmill.ut.htm).	<i>A comprehensive review of the compliance history of other uranium mines is not necessary. BLM’s analysis of environmental impacts assumes UEC’s full compliance with all permit terms and applicable rules and regulations.</i>	<i>No change required</i>
49.	Uranium Watch	“The regulations are only as good as the people who implement them. An example of poor mine management is the fact that at least one mine worker walked into a local store in San Juan County covered with material from a nearby uranium mine. It was revealed in conversation that the mine the worker had not showered before leaving the mine. This was a clear violation of MSHA regulations on the part of the worker and the mine operator.”	<i>Refer to comment response 48.</i>	<i>No change required</i>
50.	Uranium Watch	“It is clear from the discussion of mitigation measures and in other sections of the EA that there are no state or federal regulations and guidance that specifically address the development, operation, and reclamation of uranium-mining facilities. There are only EPA radon emission and a groundwater discharge standards, both of which (apparently) are not applicable to the Daneros Mine. The amount of radioactivity already left at the site far exceeds the standards for the reclamation of soils at uranium mill sites. There is no scientific or health and safety justification for this situation.”	<i>Federal and state reclamation standards for licensed uranium mills do not apply to underground uranium mines. Refer also to comment response 37.</i>	<i>No change required</i>

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51.	Uranium Watch	"There are no post operational and reclamation standards and guidelines referenced in the EA. The EA does not refer to any specific studies, policies, or regulations that outline the best management practices and technical standards for uranium mine operations and uranium mine reclamation. There is no comprehensive program that the BLM or any other regulatory agency is implementing. Therefore, the Daneros Mine will likely have no air quality permit, no radiation-monitoring program, no reporting of radon emissions, no remediation standards, no post-closure monitoring program, no monitoring of the impacts to the wildlife and ephemeral stream, and no comprehensive assessment of the cumulative impacts to the site."	<i>Refer to comment response 37.</i>	<i>No change required</i>
52.	Uranium Watch	"The EA fails to discuss why the historic waste pile was not moved to a more appropriate location and what the standards for the clean up of the abandoned mine were used." The comment also suggests, "The BLM should address the clean up of the historic waste rock pile by moving it to a more appropriate location and placing the waste rock and on-site contaminated soils in a manner that mitigates potential leaching."	<i>UEC would reclaim a portion of the old McCarty-Coleman waste rock dump. The beneficial impacts of reclaiming a part of the historic dump are disclosed in the EA. Also, refer to comment response 8.</i>	<i>Section 2.4 added</i>
53.	Uranium Watch	"The EA should have considered a clean-up alternative for the historic waste rock pile if the No Action Alternative was chosen, rather than relying on the approval of the Daneros Project as a way to mitigate the impacts of the historic waste pile. See 40 C.F.R. § 1502 (an EIS "shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment")."	<i>Refer to comment response 8. BLM is not using the Proposed Action as way to mitigate the impacts of the historic waste rock pile. BLM is responding to UEC's Plan of Operations that includes the covering and reclamation of that part of the old waste rock dump which would be re-disturbed by its operations.</i>	<i>Section 2.4 added</i>
54.	Uranium Watch	In regard to the cumulative impacts analysis presented in the EA, Uranium Watch states, "The discussion of Past and Present Actions fails to assess the environmental impacts of historic uranium mining in the Red Canyon, White Canyon, and broader Colorado Plateau and Four Corners region. The BLM analyze past, current, and foreseeable uranium mining and milling on public lands in Utah and the Four Corners region. The BLM should analyze the impacts from both mining and milling." Uranium Watch goes on to allege, "Without such an analysis the BLM cannot claim that they have analyzed the cumulative impacts of uranium mining, whether in the immediate area of the Daneros Mine or the public lands that have historically been impacted by this industrial activity. See discussion of the need for a full EIS, below."	<i>Refer to comment response 22.</i>	<i>Chap 4 -cumulative impacts</i>
55.	Uranium Watch	"The EA should include updated information about the Tony M Mine and White Mesa Uranium Mill. According to March 19, 2009, Reuters news report: 'The Canadian company will temporarily suspend production at its Sunday and Rim mines in the western United States, and will likely shut its White Mesa mill in May, once it produces the 500,000 pounds of uranium the company is under contract to produce in 2009. The mill would be expected to restart next year.	<i>Representation of this information is outside the scope of this analysis.</i>	<i>No change required</i>

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		< http://www.uraniumwatch.org/denisonmill.ut/reuters_denisonhaltsmines.090319.pdf?DocID=96&v1ID=&RevID=379&lang=1 >C.”		
56.	Uranium Watch	“The discussion of Reasonably Foreseeable Actions does not include updated information about proposed drilling and uranium mine operations in Utah, let alone in the vicinity of the Daneros Mine. The discussion does not include information about the projects anticipated by White Canyon Uranium, the parent company of Utah Energy Corporation. According to the White Canyon Uranium website, the company has three additional proposed uranium projects in the vicinity of the Daneros Project in San Juan County. See < http://www.whitecanyonuranium.com.au/projects/locationmaps/ >.”	<i>Refer to comment response 10.</i>	<i>No change required</i>
57.	Uranium Watch	“The BLM should consider other ore processing scenarios, including the processing of the ore at the Shootaring Canyon Mill and the mills proposed in Green River, Utah, and the Paradox Valley, Colorado.”	<i>BLM has determined that uranium mining and milling are not connected actions in this case. The Daneros Mine is not exclusively connected to either the White Mesa Mill or any other mill. The White Mesa Mill already exists and therefore any impact analysis associated with that mill is outside the scope of this analysis.</i>	<i>No change required</i>
58.	Uranium Watch	The EA should include Scott Clow, Director of the Ute Mountain Environmental Program for the Ute Mountain Ute Tribe, in the Consultation and Coordination List, Table 9. “Considering that the Ute Mountain Ute tribal land is adjacent to the White Mesa Uranium Mill and the nearby White Mesa Ute community will be directly impacted by the processing of the Daneros Mine ore, I would think that the BLM would have wanted to contact Mr. Clow and solicit the Ute Mountain Ute Environmental Program's comments.”	<i>Refer comment response 57.</i>	<i>No change required</i>
59.	Uranium Watch	“The EA does not contain any information regarding the amount of surety that will be required for site reclamation. The BLM should state the amount of the surety that will be required for the Daneros Mine.”	<i>UEC's estimate of reclamation costs was included in the Plan of Operations which was made available to the public. BLM's analysis of environmental impacts is not based on a specific surety amount. It was assumed that UEC would meet the financial guarantee requirements and that the surety will be sufficient to ensure the site can be reclaimed to the standards incorporated in the Plan of Operations and specified as conditions of approval. An adequate surety will be determined by the BLM in consultation with the Utah Division of Oil, Gas and Mining.</i>	<i>No change required</i>
60.	Uranium Watch	“The EA does not contain any information regarding the ground water quality, air quality, and soil remediation standards and other site reclamation requirements that must be met by the site reclamation plan. Considering the amount of contamination that will be at the site at the onset of mining operations, one can only expect that similar contamination levels will be acceptable in the future. The BLM should clearly state the ground water quality, air quality, and soil remediation standards and other site reclamation requirements that must be met by the site reclamation plan. The BLM should assess the future impacts to the site of the reclaimed mine, based on those site reclamation requirements.”	<i>Refer to comment response 37.</i>	<i>No change required</i>
61.	Uranium Watch	“The EA fails to acknowledge, assess, or consider the environmental impacts of uranium due to its toxic properties. The BLM should discuss the health and	<i>The EA states the Utah Division of Water Quality maximum numeric criteria for uranium. However, additional discussion of the toxic properties of uranium was</i>	<i>Ch. 4 – Water quality</i>

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		environmental impacts of uranium as a toxic material that would result from the operation of the Daneros Mine.”	<i>added to Chapter 4 of the EA under water quality.</i>	
62.	Uranium Watch	“The EA fails to acknowledge and analyze the impacts to the low-income tribal community that lives less than five (5) miles from the uranium mill where the Daneros Mine ore is proposed to be milled. The BLM must identify and address the disproportionately high and adverse impacts on the Ute Mountain Ute and Navajo tribal communities that live in San Juan County in the vicinity of the White Mesa Uranium Mill. Such an analysis has never been conducted, despite the fact that the federal government had regulatory responsibility for the White Mesa Mill between 1994 (the date of Executive Order 12898) and 2004, when the DRC took over regulatory responsibility for the mill.	<i>Appendix A includes a discussion on Environmental Justice. Refer to comment response 57.</i>	<i>No change required</i>
63.	Uranium Watch	“The BLM must develop a full EIS that would consider the Environmental Justice implications of the uranium mining industry in the Four Corners area on the tribal communities in Utah, Colorado, Arizona, and New Mexico.”	<i>Refer to comment response 62.</i>	<i>No change required</i>
64.	Uranium Watch	<p>“The BLM should draft an EIS prior to authorizing any activity on public lands related to the Daneros Mine. Such an EIS would develop a full environmental analysis of the cumulative impacts of the uranium mining and milling industry on public lands and tribal and low-income communities in the Four Corners region for the following reasons:</p> <p>A. The National Environmental Policy Act, 42 U.S.C. §§ 4321–4361, is our “basic national charter for protection of the environment.” The Council on Environmental Quality promulgated uniform regulations implementing NEPA that are binding on all federal agencies at 40 C.F.R. §§ 1500 et seq. NEPA’s primary purposes are to insure fully informed decision-making and to provide for public participation in environmental analyses and decision-making. See 40 C.F.R. § 1500.1(b) and (c). The BLM is required under NEPA to prepare an EIS for all major federal actions significantly affecting the quality of the human environment. See 42 U.S.C § 4332(2) (independent requirement that agencies must “study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources”). NEPA requires federal agencies to provide a “full and fair discussion” of significant environmental impacts that is “supported by evidence that the agency has made the necessary environmental analyses.” See 40 C.F.R. § 1502.1. The discussion must include an analysis of the likely cumulative environmental impacts of proposed actions. See 40 C.F.R. §§ 1508.7 and 1508.25(a)(2).</p> <p>B. The mining and milling of uranium on public land in the Four Corners region is a broad federal action, pursuant to 40 C.F.R. § 1502.4, which states:</p> <p>Sec. 1502.4 Major Federal actions requiring the preparation of environmental impact statements. (a) Agencies shall make sure the proposal which is the subject of an environmental impact statement is properly defined. Agencies shall use the</p>	<i>Refer to comment response 29.</i>	<i>No change required</i>

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		<p>criteria for scope (Sec. 1508.25) to determine which proposal(s) shall be the subject of a particular statement. Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement.</p> <p>(b) Environmental impact statements may be prepared, and are sometimes required, for broad Federal actions such as the adoption of new agency programs or regulations (Sec. 1508.18). Agencies shall prepare statements on broad actions so that they are relevant to policy and are timed to coincide with meaningful points in agency planning and decision making.</p> <p>(c) When preparing statements on broad actions (including proposals by more than one agency), agencies may find it useful to evaluate the proposal(s) in one of the following ways:</p> <p>(1) Geographically, including actions occurring in the same general location, such as body of water, region, or metropolitan area.</p> <p>(2) Generically, including actions which have relevant similarities, such as common timing, impacts, alternatives, methods of implementation, media, or subject matter.</p> <p>(3) By stage of technological development including federal or federally assisted research, development or demonstration programs for new technologies which, if applied, could significantly affect the quality of the human environment. Statements shall be prepared on such programs and shall be available before the program has reached a stage of investment or commitment to implementation likely to determine subsequent development or restrict later alternatives.</p> <p>(d) Agencies shall as appropriate employ scoping (Sec. 1501.7), tiering (Sec. 1502.20), and other methods listed in Secs. 1500.4 and 1500.5 to relate broad and narrow actions and to avoid duplication and delay.</p> <p>Clearly, the current, past, and future development of the mining and milling industry involves federal actions within a geographically defined region. Historic, current, and future actions related to uranium mining and milling have relevant similarities in their impacts, alternatives, and subject matter; involve similar technologies; and have and will continue to significantly affect the quality of the regional natural and human environment.”</p>		
65.	Uranium Watch	<p>“Past environmental analyses or uranium mining activities in the region were nonexistent or developed on an ad hoc, site-specific basis. Environmental analyses for most uranium mines in Utah are outdated and inadequate. Currently, there are two uranium mines on BLM land in San Juan County that have been operating in the past year: the Rim Mine and the Pandora Mine. Another mine that is on BLM land in San Juan County, the Velvet Mine, is proposed to reopen and is undergoing a Division of Water Quality permitting process. The NEPA review of the Pandora Mine is decades old and the Pandora</p>	<p><i>With the exception of transportation on Highway 191 to the White Mesa Mill, the three mines cited are far removed from the Proposed Daneros Mine (60-80 miles) and impacts from those operations are unrelated to those at the Daneros Mine. The impact of the added Daneros traffic on Highway 191 are adequately discussed in the EA.</i></p>	No change required

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		is operating on a Utah Division of Oil, Gas, and Mining (DOGM) permit that was not properly extended by the mine owners and DOGM. The NEPA reviews for the Rim and Velvet Mines are also out of date. The environmental impacts of the restarts of these order mines must be looked at anew and in a broad, regional context."		
66.	Uranium Watch	"The Sunday Mine Complex, on BLM land in Colorado, has been supplying ore to the Denison Mines' mill in the last year. Other mines in Colorado and Arizona that are expected to supply ore to the mill have been permitted or have been proposed. There are also historic uranium mines in Arizona and Colorado whose past and current environmental impacts have not been assessed."	<i>Refer to comment response 65.</i>	<i>No change required</i>
67.	Uranium Watch	"The BLM should develop a full EIS that would consider the full environmental impacts Environmental Justice implications of the past, current, and foreseeable activities of the uranium mining and milling industry southeastern Utah and in the Four Corners area. The BLM must develop an EIS in the context of a broad federal action associated with uranium mining and milling in the region."	<i>Refer to comment response 29.</i>	<i>No change required</i>
68.	Uranium Watch	"The BLM should assess and choose an alternative that requires the removal and cleanup of the waste rock pile and the clean up of the ore pad and other contaminated soils and materials prior to commencing any new uranium mining at the Daneros site."	<i>Refer to comment response 8.</i>	<i>Section 2.4 added</i>
Marc Stilson, State of Utah, Department of Natural Resources, Division of Water Rights April 02, 2009 Comment Letter				
69.	Utah Division of Water Rights	"Concerns with interference to the existing water rights on Bullseye Spring and Well are not related to the new proposed well but to the potential that mining activities may cause sufficient disturbance to the bedrock formation that pathways for water flow would be established into the mine from the upper aquifer via faults and fractures." "All of these discontinuities may allow the transmission of water between formations." Based on these concerns the Southeastern Regional Engineer recommends, "that a water-monitoring program be implemented to determine if there are any impacts to the existing Bullseye Spring and Well from mining operations and if such impacts are observed, a water replacement program be implemented to mitigate potential damage to the livestock operations dependent on these water sources."	<i>A discussion of impacts was added to section 4.2.2.1 of the EA in response to comments. BLM will require UEC to monitor the Bullseye Spring and Well as a condition of approval.</i>	<i>Section 4.2.2.1</i>
Chris Webb, Blanding City Manager April 09, 2009 Comment Letter				
70.	City of Blanding	"We want to go on record as supporting the extraction of minerals on public lands in accordance with current standards. This includes the approval of the White Canyon Dinero Mine."	<i>Comment noted. No change to the EA required.</i>	<i>No change required</i>
Sherwin & Annette Shumway Undated, Comment Letter				
71.	S. and A.	"In regard to the Daneros mine that White Canyon mining Co is permitting. I	<i>Comment noted. No change to the EA required.</i>	<i>No change required</i>

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	Shumway	think it is a help to the economy of this areas. I think it is a good thing for the mining industry also."		
<p align="center">M. Shumway April 04, 2009 Comment Letter</p>				
72.	M. Shumway	"I feel this would be a great benefit to the area economically."	<i>Comment noted. No change to the EA required.</i>	<i>No change required</i>